

DWIGHT C. HOLTON, OSB #09054  
United States Attorney  
District of Oregon  
CHRISTOPHER L. CARDANI  
Assistant United States Attorney  
405 East Eighth Avenue, Suite 2400  
Eugene, Oregon 97401  
(541) 465-6771

[chris.cardani@usdoj.gov](mailto:chris.cardani@usdoj.gov)

CHARLES F. GORDER, JR., OSB# 912874  
Assistant United States Attorney  
1000 SW Third Avenue, Suite 600  
Portland, Oregon 97204  
(503) 727-1117

[charles.gorder@usdoj.gov](mailto:charles.gorder@usdoj.gov)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. CR 05-60008-HO
	)	
v.	)	GOVERNMENT'S <b>THIRD AMENDED</b>
	)	EXHIBIT LIST
	)	
PIROUZ SEDAGHATY,	)	
	)	
Defendant.	)	

The United States, through its undersigned counsel, submits the following **third amended** list of exhibits it may introduce at trial.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
IRS-1	Certified copy of 2000 Form 990 signed by Pete Seda for Al-Haramain Islamic Foundation
IRS-2	Withdrawn

IRS-3	Certified copy of IRS Form 1023 Application for tax exempt status dated 12/31/99 for Al-Haramain Islamic Foundation, Inc. (missing page 10)
IRS-4	Certified copy of IRS determination letter dated 12/7/2000 granting temporary charitable status to Al-Haramain Islamic Foundation, Inc.
AMX-1	American Express Traveler's Checks, 130 original checks signed by Soliman Al-But'he
AMX-2	American Express trust receipt
AMX-3	Translation of back of American Express Traveler's Checks
FE-1	First Escrow settlement statement dated 6/23/2000 for purchase of 2151 E. Division, Springfield, MO
BOA-1	Signature card for Al-Haramain's Bank of America account number 28803-11561
BOA-2	January 1999 through January 2000 bank statements, Al-Haramain account number 28803-11561
BOA-3	Two-page February 2000 bank statement, Al-Haramain account number 28803-11561
BOA-4	Two-page March 2000 bank statement, Al-Haramain account number 28803-11561
BOA-5	April 2000 through October 2001 bank statements, Al-Haramain account number 28803-11561
BOA-6	Check number 9264, dated 1/25/98, for \$2,060, account number 28803-11561
BOA-7	Check number 9456, dated 3/10/00, for \$131,300, account number 28803-11561
BOA-8	Bank of America check number 9624 dated 3/11/00 for \$21,000 issued to Bank of America, Al-Haramain account number 28803-11561

BOA-9	Bank of America cashier's check number 1001040568 dated 3/11/00 for \$21,000 issued to Soliman Al-But'he
BOA-9a	Translation of \$21,000 Bank of America cashier's check
BOA-10	Al-Haramain check # 9733 dated 6/23/00 for \$318,291.74, account number 28803-11561
BOA-11	Wire transfer dated 9/19/00, for \$4,000, Account number 28803-11561
BOA-12	May and June 2000 statements, Al-Haramain account number 3473386549
BOA-13	Deposit of traveler's checks on May 18, 2000 totaling \$275,000
BOA-14	Signature card for Bank of America account number 28804-07035 in the name of <i>The Arborist</i>
BOA-15	April 1999 statement, Bank of America account number 28804-07035
BOA-16	Bank of America wire transfer dated 4/15/99 from <u>The Arborist</u> to Al-Haramain Islamic Foundation in Tirane, Albania
BOA-17	Bank of America cashier's check Number 1001041224 dated 6/23/00 for \$318,291.74 issued to First Escrow Inc.
BOA-18	Signature card and corporate documents for Al-Haramain's Bank of America account number 003473386549
BOA-19	Bank of America wire transfer dated 1/16/01 from Pete Seda to David Rodgers at Bank Al Rajhi in Saudi Arabia
BOA-20	Bank of America wire transfer dated 6/18/01 from Pete Seda to David Rodgers at Bank Al Rajhi in Saudi Arabia

ICE CBP-1	Form I-94 admission/departure number 35584030208 showing entry of Soliman Al-But'he on March 7, 2000 and exit on March 12, 2000
ICE-FinCEN-1	Results of CMIR query
ICE-FinCEN-2a	CMIR dated 10/27/97 for \$141,600 filed by Al-But'he
ICE-FinCEN-2b	CMIR dated 12/30/97 for \$65,000 filed by Al-But'he
ICE-FinCEN-2c	CMIR dated 2/7/99 for \$35,000 filed by Al-But'he
ICE-FinCEN-2d	CMIR dated 6/22/99 for \$80,000 filed by Al-But'he
ICE-FinCEN-2e	CMIR dated 6/26/99 for \$75,000 filed by Al-But'he
ICE-FinCEN-2f	CMIR dated 5/16/000 for \$300,520 filed by Al-But'he
ICE-FinCEN-2g	CMIR dated 8/13/00 for \$15,900 filed by Al-But'he
ICE-FinCEN-2h	CMIR Financial Data Base Information dated 11/10/00 for \$34,000 filed by Al-But'he
ICE-FinCEN-2i	CMIR dated 4/22/01 for \$30,825 filed by Al-But'he
ICE-FinCEN-3	Blank CMIR with instructions in effect in March 2000
ICE-FinCEN-4	CMIR Summary
RDK-1	Letter dated 8/9/00 to Pete Seda with attached closing documents
RDK-2	R.D. Kanan file
AHIF-1	Copy of Bank of America cashier's check number 1001040568 for \$21,000
AHIF-1a	Translation of Bank of America cashier's check number 1001040568 for \$21,000
AHIF-2	Agreement between Soliman and Abu Yunus
AHIF-2a	Translation of dates on Agreement between Soliman and Abu Yunus

AHIF-3	Agreement between Soliman and Abu Yunus
AHIF-3a	Translation of dates on agreement between Soliman and Abu Yunus
AHIF-8	El-Feki E-mail dated February 2000
AHIF-9	Letter dated 2/21/00 from Aqeel to Al-Fiki
AHIF-10	Explanation by Pete Sedaghaty for Al-Haramain expenses
AHIF-11	Correspondence pertaining to Al-Haramain books and records
AHIF-12	Al-Haramain monthly summary reports for February and March 2000
SW-1	Two video tapes pertaining to Chechen mujahideen battles with Russian forces.
SW-1a	Translation of video clips
SW-2	Photo of Daveed Gartenstein-Ross
SW-3	Photo of Daveed Gartenstein-Ross inside mosque
SW-4	Photo of Abdul Qaadir
SW-5	E-mail with attachment from Abdul-Qaadir dated 1/04/2000 at 1:00 a.m.
SW-6	E-mail with attachment from Soliman Al-But'he to Ashland dated 1/04/00 at 2:32 p.m.
SW-7	E-mail with attachment to undisclosed recipient dated 1/5/2000 at 02:22 a.m.
SW-8	E-mail from AQ to undisclosed-recipient with attached photos dated 1/14/00 at 9:56 p.m.
SW-9	E-mail with attachment from Sunnah dated 1/16/00 4:50 a.m.

SW-10	E-mail from Abdul Qaadir dated 1/20/00 at 07:58 p.m.
SW-11	E-mail from Pete Seda to Al-But'he dated 1/22/00 at 3:00 p.m.
SW-12	E-mail from Abdul-Qaadir dated 1/24/00 at 3:04 a.m.
SW-13	E-mail to Sheeshaan group dated 1/24/00 at 10:35 p.m.
SW-14	E-mail to Sheeshaan group dated 1/24/00 at 10:48 p.m.
SW-15	Withdrawn
SW-16	E-mail to Sheeshaan group dated 2/05/00 at 09:37 p.m.
SW-17	E-mail from Qoqaz website to ptichka dated 2/06/00 at 1:06 p.m.
SW-18	E-mail from P to Azzam.com dated 2/12/00 at 3:47 p.m.
SW-19	Azzam.com Jihad in Chechnya site February 17, 2000
SW-20	E-mail from <i>The Arborist</i> to Azzam dated 2/17/00 at 1:07 a.m.
SW-21	E-mail from Alshoumar to P dated 2/19/00 at 01:10 a.m.
SW-22	E-mail from P to Alharamain dated 2/21/00 at 03:54
SW-23	E-mail from Al-But'he to Pete dated 2/23/00 at 3:23 p.m.
SW-24	E-mail from <i>The Arborist</i> to Ferhad dated 2/25/00 12:42 a.m.
SW-25	E-mail from Alshoumar to Ashland dated 2/25/00 10:59 p.m.

SW-26	E-mail to Sheeshaan group dated 2/25/00 at 11:45 p.m.
SW-27	E-mail to Sheeshaan group dated 2/29/00 at 08:01 a.m.
SW-28	E-mail to Sheeshaan group dated 3/6/2000 at 05:53 a.m.
SW-29	E-mail from <i>The Arborist</i> dated 3/8/00 at 1:31 p.m.
SW-30	E-mail to Sheeshaan group dated 3/8/00 at 23:22:09
SW-31	E-mail to Sheeshaan group dated 3/22/00 at 10:23 p.m.
SW-32	E-mail with attachment from P to Alshoumar dated 4/12/00 10:38 p.m.
SW-33	E-mail to Sheeshaan group dated 5/28/00 at 09:31 p.m.
SW-34	E-mail from Al-But'he to P dated 6/20/2000 at 2:41 a.m.
SW-35	Withdrawn
SW-36	E-mail from P to Sheeshaan dated 9/18/00 at 12:45 a.m.
SW-37	E-mail to Sheeshaan group dated 9/20/00 at 12:51 a.m.
SW-38	E-mail from P to Al-But'he dated 10/18/00 at 3:47 p.m.
SW-39	E-mail from P to Alshouas dated 10/18/00 at 6:49 p.m.
SW-40	E-mail to Sheeshaan group dated 11/17/00 at 04:57 a.m.
SW-41	Withdrawn

SW-42	E-mail to Sheeshaan group dated 9/4/01 at 7:14 a.m.
SW-43	E-mail with attachments from Shoumar to Abo Yunus dated 9/29/01 at 3:28 a.m.
SW-44	Photo of foreign fighters in Chechnya
SW-45	Photo of leaders of foreign fighters in Chechnya
SW-46	Photo of foreign fighters in the snow in Chechnya
SW-47	Jihad in Chechnya banner
SW-48	Photo of Kavkaz Institute
SW-49	Jihad in Chechnya banner
SW-50	Jihad in Chechnya banner
SW-51	HTML file titled "Help Jihad"
SW-52	Word document regarding question 6, interview with Khattab
SW-53	Undated report to Brother Abdul Aziz
SW-54	Azzam.com Jihad in Chechnya Russian language site
SW-55	Azzam.com Jihad in Chechnya site requesting Russian translators
SW-56	Azzam.com Jihad in Chechnya site, profile of Khattab
SW-57	Azzam.com Jihad in Chechnya site links to profiles
SW-58	Azzam.com Jihad in Chechnya site, maps of Chechnya
SW-59	Map of battles in Grozny
SW-60	Map of Mujahideen's tactical movements out of Grozny



SW-61	Online Translator Service
SW-62	E-mail from Shoumar to Abo Yunus dated April 2, 2001 at 2:41 a.m.
SW-63	Withdrawn
SW-64	Floor plan of 3800 S. Highway 99 Ashland, Oregon
SW-65	E-mail to Sheeshaan group dated 2/15/00 at 9:22 p.m.
SW-66	Photo of AHIF building at 3800 S. Highway 99 Ashland, Oregon
SW-67	E-mail from P to Shoumar, Abdulaziz S dated 3/12/2001 at 1:56 a.m.
SW-68	E-mail to Sheeshaan group dated 3/8/2000 at 10:21 p.m.
SW-69	E-mail from Q to AQ dated 2/12/00 at 12:35 p.m.
JC-1	Withdrawn
JC-2	Withdrawn
JC-3	Withdrawn
JC-4	Summary Report
EK-1	Al Haramain website article titled "The Latest News About the Jihaad In Chechnya"
EK-2	Al-Haramain online newsletter dated February 2000, titled Jihaad
EK-3	Al Haramain website article titled "Brotherhood"
EK-4	Fatwa by al-Jibrin regarding Chechen Mujahideen from Al-Haramain website
EK-4a	Translation of fatwa by al-Jibrin regarding Chechen Mujahideen from Al-Haramain website

EK-5	Question and statement by al-Uthaymin from Al-Haramain website
EK-5a	Translation of Question and statement by al-Uthaymin from Al-Haramain website
EK-6	Al-Haramain website article about Kavkaz Institute
EK-6a	Translation of Al-Haramain website article about Kavkaz Institute
EK-7	DVD of Kavkaz Institute
EK-7a	Translation of DVD of Kavkaz Institute
EK-8	Map of Chechnya
EK-9	Picture of Shaykh Abu Omar al-Sayf
TW-1	Al Haramain Islamic Foundation Transaction Detail by Account for reimbursed expenses, dated 9/19/01
TW-2	Al Haramain Islamic Foundation Transactions by Account for Springfield Building, dated 9/24/01
TW-3	Al Haramain Islamic Foundation Transaction Detail by Account for Contributions Income Unrestricted, dated 10/2/01
TW-4	Copy of check for \$21,000
TW-5	Copy of check for \$131,300
OCC-1	Assumed Business Name – New Registration Document
OCC-2	Articles of Incorporation of Al Haramain Islamic Foundation, Inc.
DGR-1	Appendix IV “The Call to Jihad” Pages 1224 -1245
DGR-2	Pages 130 and 133 from book entitled <i>Islamic Guidelines</i> distributed by Al Haramain Foundation

DGR-3	Picture of Soliman Al-But'he
BC-1	E-mail from Raya Shokatfard dated 10/24/00
ALR-1	Al-Rajhi Bank records for Soliman Al-But'he's Account number 140608010109206
ALR-1a	Translation of Al-Rajhi Bank records for Soliman Al-But'he's Account number 140608010109206
ALR-2	Al-Rajhi Bank statements for Soliman Al-But'he's Account number 140608010109206
ALR-2a	Translation of Al-Rajhi Bank statements for Soliman Al-But'he's account number 140608010109206

DATED this 26th day of August, 2010.

Respectfully submitted,  
DWIGHT C. HOLTON  
United States Attorney

*/s/ Christopher L. Cardani*

By: \_\_\_\_\_  
CHRISTOPHER L. CARDANI  
Assistant United States Attorney

*/s/ Charles F. Gorder, Jr.*

By: \_\_\_\_\_  
CHARLES F. GORDER, JR.  
Assistant United States Attorney